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August 19, 1996

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William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service
MM Docket No. 87-268

Dear Mr. Caton:

Transmitted herewith is an original and 11 copies of an Erratum to Reply Comments filed by Philips Electronics North America Corporation in response to the Fifth NPRM in the above-referenced docket.

Please direct any questions that you may have to the undersigned.

Respectfully submitted,

Lawrence R. Sidman

Lawrence R. Sidman

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	MM Docket No. 87-268
and Their Impact Upon the	)	
Existing Television Broadcast	)	
Service	)	

ERRATUM TO REPLY COMMENTS OF
PHILIPS ELECTRONICS N.A. CORPORATION

On August 12, 1996, the undersigned filed Reply Comments on behalf of Philips Electronics N.A. Corporation. Attached are revised pages 3 and 9 of these Reply Comments, which delete two inadvertent and erroneous references to William Schreiber, who is a Professor of Electrical Engineering, Emeritus with the Massachusetts Institute of Technology.

Respectfully submitted,

PHILIPS ELECTRONICS N.A. CORPORATION

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August 19, 1996

The specifics of the opposition expressed by the cable industry and CICATS flow absolutely logically from their anticompetitive motivations. Both oppose adoption of any DTV standard, a position at odds with almost all other commenters, including several associated with the computer industry and MIT Professor William Schreiber, whose views are recommended (and appended) by CICATS in its initial Comments. Although cloaked in a professed desire not to freeze technology or stifle innovation, their opposition to any standard is rooted in their clear understanding that a DTV standard is absolutely necessary to achieving the level of technical, marketplace and investment certainty essential to the successful introduction of digital television in the United States. They have witnessed the lesson of the failure to adopt an AM stereo standard -- the launch of a new broadcast service is doomed -- and experience no qualms about replicating that failed scenario in the field of digital television.

Although the cable industry stops there, taking no position on the merits of the ATSC DTV standard, CICATS offers an alternative to the Commission, if it elects to adopt a DTV standard. CICATS proposes a minimum "base-line" standard consisting of only one video format, 480 vertical lines progressive scanned with square spacing of pixels and temporal layering for variable picture rates.[4/] The most distinguishing characteristic of the CICATS proposal is that it does not exist. It is only a concept that has not been developed fully or tested at all, in marked contrast to the incredibly rigorous and exhaustive real time and real world testing undergone by the ATSC DTV standard. Its second most distinguishing characteristic is that it is vastly inferior in capability to the ATSC DTV standard, in part because it does not offer a true high definition ("HDTV") video format, i.e, 1080-vertical lines. Again, this fatal shortcoming is a logical outgrowth of CICATS' fundamental lack of interest in enhancing the free, over-the-air television system. CICATS views this proceeding as a vehicle for forcing the accelerated convergence of the computer and television industries. Its base-line proposal is crafted to do just that: impose a computer model for the developing digital TV marketplace, predicated on minimum "base-line" performance which will require consumers to upgrade constantly -- following the pattern established by the computer industry in its 286, 386, 486 and pentium processor hardware and successive mini-generations of operating software such as Windows. CICATS appears to have no reservations about denying consumers the benefits of true HDTV and denying consumers the benefits of receivers with long product lives.

4/ *See,* CICATS Comments, Vol. I, pp. 31-37, and Vol. II, Exhibit B.

commenters who expressed reservations about certain aspects of the proposed ATSC DTV standard nevertheless recognize that there is a clear need for the FCC to establish a DTV terrestrial broadcast transmission standard. For example, Intel, a participant in CICATS, urges adoption of a DTV standard because it is "essential to ensuring interoperability between televisions sets and computers."[21/] Similarly, the Information Technology Industry Council, advocates prompt adoption and implementation of a DTV standard.[22/] Finally, Professor William Schreiber states that, "to ensure stability [of investments in DTV], a standard must be set with sufficient detail so that the equipment initially installed by broadcasters and viewers alike will continue to operate successfully as the expected further development proceeds."[23/] In short, the record in this proceeding requires the FCC to adopt some DTV standard.

III. OPPONENTS HAVE FAILED TO MEET THEIR BURDEN OF PROOF TO SHOW THAT THE ATSC DTV STANDARD SHOULD NOT BE ADOPTED.

Notwithstanding the forests downed by their comments, opponents of the ATSC DTV standard's adoption have failed completely to meet their burden of proof to justify the Commission's not adopting the standard it has proposed. Moreover, the opponents have done nothing to disprove the proposition that the standard is the most advanced, flexible and interoperable digital television standard in the world.

A. The FCC's Adoption of the ATSC DTV Standard Will Not Be A Barrier to the Convergence of Television and Computer Technology.

CICATS' core criticism of the ATSC DTV standard is that the mere presence of interlaced scan formats will prohibit the eventual migration to full progressive scan and thus block the convergence of computers and televisions.[24/] That is simply false. In fact, the ATSC DTV standard will do more to drive interoperability of television and computer media -- both domestically and internationally -- than any standard now in existence.

21/ *See,* Intel Comments at Footnote 2.

22/ *See,* Information Technology Industry Council Comments at 1.

23/ *See,* Schreiber Comments at 2.

24/ *See,* CICATS Comments at 19-25, 27.